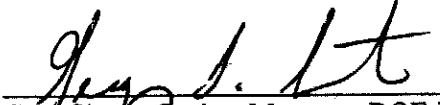


## Meeting Minutes – Approval


M-026 LDR Report Project Manager Meeting Minutes  
For  
Federal Building, Conference Room 554  
Richland, Washington  
Meeting Held March 13, 2002  
From 12:30 PM to 1:30 PM

**RECEIVED**  
APR 30 2002  
**EDMC**


The undersigned indicate by their signatures that these meeting minutes reflect the actual occurrences of the above dated meeting.

 Date: 3/27/02  
Greg Sinton, Project Manager, DOE-RL

 Date: 3/26/02  
Woody Russell, Project Manager, DOE-ORP

 Date: 4/3/02  
Laura Ruud, Project Manager, Washington State Department of Ecology

## Contractor Concurrence

 Date: 26 Mar 02  
Richard Gurske, LDR Report Project Manager, FH

 Date: 3/26/02  
Anthony Miskho, LDR Report Coordinator, FH

**Purpose:** Discuss TPA Project Manager dispute of the CY2000 LDR Report

The attached minutes are comprised of the following:

Attachment 1 - Meeting Agenda

Attachment 2 - Attendance List

Attachment 3 - Action Items

Attachment 4 - Dispute Resolution Package Handout

**Attachment 1**

**M-026 LDR Report Project Manager Meeting Minutes  
For  
Federal Building, Conference Room 554  
Richland, Washington  
Meeting Held March 13, 2002  
From 12:30 PM to 1:30 PM**

**Meeting Agenda**

**Agenda:**

1. Changes to settlement package:
  - Attorney's sentence
  - Contractors may do assessment
2. DOE actions left to sign settlement package
3. Summer workshop discussions
4. Setting up monthly M-26 project manager meeting

**Attachment 2**

**M-026 LDR Report Project Manager Meeting Minutes  
For  
Federal Building, Conference Room 554  
Richland, Washington  
Meeting Held March 13, 2002  
From 12:30 PM to 1:30 PM**

**Attendance List**

<u>Name</u>	<u>Organization</u>
R. H. Gurske	FH
J. B. Hebdon	DOE-RL
M. F. Jarvis	DOE-RL
A. G. Miskho	FH
E. J. Murphy-Fitch	FH
P. A. Powell	CHG
C. R. Richins	DOE-RL
W. Russell	DOE-ORP
L. E. Ruud	Ecology
G. L. Sinton	DOE-RL
R. R. Skinnarland	Ecology
H. T. Tilden	PNNL
D. M. Yasek	BHI

**Attachment 3**

**M-026 LDR Report Project Manager Meeting Minutes  
For  
Federal Building, Conference Room 554  
Richland, Washington  
Meeting Held March 13, 2002  
From 12:30 PM to 1:30 PM**

**Summary of Commitments/Agreements**

<b>Action Item #</b>	<b>Responsible Party</b>	<b>Description</b>	<b>Date Closed</b>
1	Ecology (Ruud)	Ecology to discuss dispute extension with Attorneys General office	1/9/2002
2	DOE (Sinton)	DOE to provide response to Ecology expectations	1/9/2002
3	DOE/Ecology	Discuss with respective legal counsels options for closing out the CY2000 report.	1/22/2002
4	DOE/Ecology	Small group to be formed and to finalize expectations	1/22/2002
5	DOE/Ecology	Small group to continue working on dispute resolution product	3/13/2002
6*	DOE/Ecology	Set up next scheduled meeting sometime in May factoring the topics contained in Attachment 4	

*\*New* = action item assigned at this meeting

**Attachment 4**

**M-026 LDR Report Project Manager Meeting Minutes  
For  
Federal Building, Conference Room 554  
Richland, Washington  
Meeting Held March 13, 2002  
From 12:30 PM to 1:30 PM**

**Dispute Resolution Package Handout**  
(26 pages excluding cover page)

**RESOLUTION OF DISPUTE PERTAINING TO HANFORD FEDERAL FACILITY  
AGREEMENT AND CONSENT ORDER CALENDAR YEAR 2000 HANFORD SITE MIXED  
WASTE LAND DISPOSAL RESTRICTIONS REPORT**

On November 28, 2001, the State of Washington, Department of Ecology (Ecology) notified the U.S. Department of Energy, Richland Operations (RL) that the Final CY 2000 LDR Report submitted in June 2001, was inadequate. The dispute resolution process was initiated as set forth in the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement), Article VIII and Section 9.2.1. The issues were resolved by the project managers during the informal dispute resolution period. The agreements/outcomes from these discussions are included as:

- Attachment 1: LDR Report Expectations
- Attachment 2: Errata Sheet Changes to CY 2000 LDR Report
- Attachment 3: Documentation of Other Agreements
- Attachment 4: Disposition of Dispute Deficiencies in the CY 2000 LDR Report

The signatures contained below do hereby conclude the CY 2000 LDR report dispute resolution process and subsequently approves the calendar year 2000 Hanford Site Mixed Waste Land Disposal Restrictions Report.

Nothing in this Resolution of Dispute shall be construed as limiting Ecology's enforcement authority with respect to any violation of any applicable statute or regulation, or with respect to any violation or alleged violation of the Tri-Party Agreement that is not resolved by approval of this Resolution of Dispute.

Agreed to this \_\_\_\_\_ day of March 2002.

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W. Wade Ballard, Assistant Manager  
Planning and Integration  
U.S. Department of Energy, Richland  
Operations Office

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M. A. Wilson, Manager  
Nuclear Waste Program  
State of Washington, Department  
of Ecology

---

James E. Rasmussen, Director  
Environmental Management Division  
U.S. Department of Energy, Office  
of River Protection

cc: See page 2

cc:

W. W. Ballard	RL
G. Bell	RL
L. J. Cusack	Ecology
R. Gay	CTUIR
R. H. Gurske	FH
J. B. Hebdon	RL
J. S. Hertzfel	FH
M. F. Jarvis	RL
R. Jim	YN
P. M. Knollmeyer	RL
A. G. Miskho	FH
R. D. Morrison	FH
E. J. Murphy-Fitch	FH
C. H. Mulkey	CHG
K. Niles	Oregon Energy
L. L. Piper	RL
P. A. Powell	CHG
J. E. Rasmussen	ORP
C. R. Richens	RL
L. E. Ruud	Ecology
W. Russell	ORP
G. H. Sanders	RL
G. L. Sinton	RL
D. R. Sherwood	EPA
E. R. Skinnarland	Ecology
P. Sobotta	NPT
R. F. Stanley	Ecology
H. T. Tilden	PNNL
B. D. Williamson	RL
M. A. Wilson	Ecology
R. W. Wilson	Ecology
D. M. Yasek	BHI

Administrative Record, H6-08

### **LDR Report Expectations**

1. Commitments will be incorporated into the Land Disposal Restrictions (LDR) Report either through reference to Tri-Party Agreement (TPA) milestones or as schedules<sup>1</sup> within the LDR Report. Project managers have authority to adjust schedules within the LDR Report through the primary document modification provisions in the TPA. Changes to milestones will be in accordance with the TPA process. This expectation applies to both mixed waste (MW) and potential mixed waste (PMW). In establishing TPA milestones or schedules, it is anticipated that multiple MW streams or PMW may be addressed under a single TPA milestone or milestone series or schedule.
2. The Department of Energy (DOE) shall propose TPA milestones or schedules in the LDR report for the characterization (for storage, LDR treatment, and disposal) and for treatment of all MW where treatment and disposal cannot be accomplished within one year of generation. Milestones and schedules shall reflect the known or reasonably anticipated risks of the waste and current location, as well as overall strategic plans and priorities for the site.
3. A future use must be documented for material to be included in column E of the Potential Mixed Waste Table. Documentation of the future use of items in column E shall be available upon request.
4. DOE can satisfy the requirement to establish TPA milestones or schedules for MW or PMW in the LDR Report as follows:
  - a. For MW and PMW that are covered by existing milestones, schedules, CERCLA documents, or other regulatory agency agreements, these commitments will be incorporated into the LDR Report in accordance with Expectation #1 above.
  - b. For PMW determined to be MW which can not be moved into compliant storage within 90-days, DOE shall:
    - i. Contact appropriate TPA lead regulatory agency project manager
    - ii. Propose TPA milestones or schedules for the movement or management of the MW including, as needed, TPA milestones or schedules for:
      1. Performing a DOE LDR storage assessment
      2. Complete data gap plan<sup>2</sup> and provide to the lead regulatory agency project manager for discussions
    - iii. Report the outcome of the discussions with the TPA lead regulatory agency project manager as milestones or schedules in the annual LDR report and, as applicable, propose date for negotiations.

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<sup>1</sup> The requirement for schedule can be met by providing a date in the LDR report.

<sup>2</sup> See Attachment 3 for data gap plan content description



- c. For MW and PMW not covered by existing TPA milestones or schedules
  - i. For newly discovered MW or PMW, contact appropriate TPA lead regulatory agency project manager
  - ii. Propose TPA milestones or schedules for the movement or management of the PMW or MW including, as needed, TPA milestones or schedules for:
    - 1. Performing a DOE LDR storage assessment
    - 2. Complete data gap plan and provide to the lead regulatory agency project manager for discussions
  - iii. Report the outcome of the discussions with the TPA lead regulatory agency project manager as milestones or schedules in the annual LDR report and as applicable, propose date for negotiations.
- 5. The parties have agreed to two procedures for DOE LDR storage assessments (one for the Office of River Protection [ORP] and one for the Richland Operations Office [RL]) for any location where PMW is currently located, as well as for MW in permitted units or units operating under interim status standards. DOE may have the contractors perform the required assessments. For MW in permitted units or units operating under interim status standards, there is the expectation that the location will meet all RCRA Treatment, Storage, and/or Disposal (TSD) storage requirements. For locations containing PMW, using RCRA TSD unit storage requirements as criteria for comparison, the DOE LDR assessment will be used as a part of the continuing process of evaluating whether current management practices are adequate to ensure that the threat to human health and the environment is minimized. This evaluation will be used to create schedules and/or milestones for compliance with characterization, storage, and treatment requirements, as applicable.
- 6. The LDR Report shall identify DOE LDR storage assessments planned for the next three years. Repeat assessments will be conducted, as necessary.

## Errata Sheet: Changes to CY2000 LDR report

- Volume 1, Appendix B, page B-25: Add the following explanatory text to the answer for question 2.12 concerning storage information: "An estimated 8 gallons per day are evaporating from the waste currently in the tanks due to ventilation of the cells in Building 221-T containing the tank system. The evaporation rate is approximately 3000 gallons (approximately 11 cubic meters) per year. Assuming this rate continues, the liquid fraction will have evaporated in 5.8 years. Information on the evaporation rate has been discussed with Ecology, and will be included in the Part B permit application. Administrative and engineering controls have been put in place to prevent additional liquids from entering this tank system." (Enclosure 7 to the October 29, 2001, DOE comment response package [DOE letter number 02-RCA-022]). [Fluor Hanford (FH) Location-Specific Data Sheet (LSDS) concerning 221-T tank waste]
- Volume 1, Appendix B, page B-25: Delete explanatory text from answer to question 3.1 concerning date of waste minimization assessment and replace it with "N.A." (Enclosure 7 to the October 29, 2001, DOE comment response package [02-RCA-022]). [FH LSDS concerning 221-T tank waste]
- Volume 1, Appendix B, page B-26: Delete explanatory text from answer to question 3.2 concerning waste minimization details and replace it with "N.A. – stream is no longer generated (see 2.12 of this data sheet)." (Enclosure 7 to the October 29, 2001, DOE comment response package [02-RCA-022]). [FH LSDS concerning 221-T tank waste]
- Volume 1, Appendix B, page B-26: Delete 11 m3 from answer to question 3.3.1 concerning waste reduction achieved and replace it with "0 m3." (Enclosure 7 to the October 29, 2001, DOE comment response package [02-RCA-022]). [FH LSDS concerning 221-T tank waste]
- Volume 1, Appendix B, page B-26: Delete waste volume numbers from answer to question 3.3.2 concerning projected volumes and replace the six entries with "0.000". (Enclosure 7 to the October 29, 2001, DOE comment response package [02-RCA-022]). [FH LSDS concerning 221-T tank waste]
- Volume 1, Appendix B, page B-26: Delete explanatory text from answer to question 3.3.3 concerning waste minimization bases and assumptions and replace it with "N.A." (Enclosure 7 to the October 29, 2001, DOE comment response package [02-RCA-022]). [FH LSDS concerning 221-T tank waste]
- Volume 1, Appendix B, page B-50: Delete explanatory text from answer to question 2.9 concerning non-permitted unauthorized releases. (Enclosure 2 to the October 29, 2001, DOE comment response package [02-RCA-022]). [Bechtel Hanford Incorporated (BHI) LSDS concerning 618-4 burial grounds]
- Volume 1, Appendix B, page B-80: Mark the "yes" box to answer questions 3.3.4 and 3.3.4.1, and answer question 3.3.4.2 as less than 50 ppm concerning PCBs. This data will be evaluated for subsequent LDR reports. (Enclosure 3 to the October 29, 2001, DOE comment response package [02-RCA-022]). [CH2MHill Group (CHG)/Bechtel National Inc. (BNI) Treatability Group Data Sheet (TGDS) concerning Double-Shell Tank (DST) waste]
- Volume 1, Appendix B, page B-93: Mark the yes box to answer question 2.11. Delete explanatory text and replace with the following: "It is unknown if further

information will be needed for disposal. Awaiting information such as variances and delisting petitions. Waste is sampled and characterized per RPP-8093, Fiscal Year 2002 Tank Characterization Technical Sampling Basis and Waste Information Requirements Document, 8/2001 (WIRD document) and the Regulatory Data Quality Objectives, PNNL-12040 Rev 0, 12/1998. Waste received into the tank farms must meet the DST Waste Acceptance criteria prior to receipt. [CHG/BNI LSDS concerning DST-AN waste]

- Volume 1, Appendix B, page B-97: Mark the yes box to answer question 2.11. Delete explanatory text and replace with the text contained in errata bullet for Volume 1, Appendix B, page B-93. [CHG/BNI LSDS concerning DST-AP waste]
- Volume 1, Appendix B, page B-101: Mark the yes box to answer question 2.11. Delete explanatory text and replace with the text contained in errata bullet for Volume 1, Appendix B, page B-93. [CHG/BNI LSDS concerning DST-AR waste]
- Volume 1, Appendix B, page B-105: Mark the yes box to answer question 2.11. Delete explanatory text and replace with the text contained in errata bullet for Volume 1, Appendix B, page B-93. [CHG/BNI LSDS concerning DST-AW waste]
- Volume 1, Appendix B, page B-109: Mark the yes box to answer question 2.11. Delete explanatory text and replace with the text contained in errata bullet for Volume 1, Appendix B, page B-93. [CHG/BNI LSDS concerning DST-AY waste]
- Volume 1, Appendix B, page B-113: Mark the yes box to answer question 2.11. Delete explanatory text and replace with the text contained in errata bullet for Volume 1, Appendix B, page B-93. [CHG/BNI LSDS concerning DST-AZ waste]
- Volume 1, Appendix B, page B-117: Mark the yes box to answer question 2.11. Delete explanatory text and replace with the text contained in errata bullet for Volume 1, Appendix B, page B-93. [CHG/BNI LSDS concerning DST-DCRT waste]
- Volume 1, Appendix B, page B-121: Mark the yes box to answer question 2.11. Delete explanatory text and replace with the text contained in errata bullet for Volume 1, Appendix B, page B-93. [CHG/BNI LSDS concerning DST-SY waste]
- Volume 1, Appendix B, page B-125: Mark the yes box to answer question 2.11. Delete explanatory text and replace with the text contained in errata bullet for Volume 1, Appendix B, page B-93. [CHG/BNI LSDS concerning DST-Transfer Line waste]
- Volume 1, Appendix B, page B-197: Delete the NOTE explanatory text from answer to question 2.11 and replace with: "A commitment is not necessary to complete characterization because a cradle to grave process is being implemented." [FH LSDS concerning T Plant 2706-T waste to the Liquid Effluent Retention Facility (LERF)/Effluent Treatment Facility (ETF)]
- Volume 1, Appendix B, page B-222: Delete explanatory text from answer to question 2.11 and replace with: If necessary to provide further characterization, waste will be re-characterized just prior to disposal to ensure it meets current disposal requirements, or, should further treatment be required due to changing regulations, for most efficient use of resources. Characterization of portions of this waste stream is currently scheduled for FY 2003. (Enclosure 6 to the October 29, 2001, DOE comment response package [02-RCA-022]). [FH LSDS concerning Central Waste Complex (CWC) MLLW-01 waste]
- Volume 1, Appendix B, page B-302: Delete explanatory text from answer to question

2.11 and replace with: "Additional characterization for storage at the 222-S Dangerous and Mixed Waste Storage Area is not required. Characterization needs arise as waste acceptance issues for subsequent storage at the Central Waste Complex on a case-by-case basis during either waste profile development or waste verification activities. 222-S relies on the Central Waste Complex for the identification of characterization needs for subsequent treatment and disposal of this waste as part of the waste acceptance process. No commitment is necessary for the characterization needs on this mixed waste because it will be addressed as part of the active M-91 TPA negotiations." [FH LSDS concerning 222-S MLLW-03 waste]

- Volume 1, Appendix B, page B-433: Delete explanatory text from answer to question 2.11 and replace with: "Characterization is required to address radiological parameters and visual confirmation of the contents. Actions will be completed in CY2001." [FH LSDS concerning T Plant 221-T drag off boxes MLLW-03 waste]
- Volume 1, Appendix B, page B-512: Change the answer to question 2.11 from "yes" to "no." Delete explanatory text from question 2.11. [FH LSDS concerning T-Plant M-91 MLLW-07 waste]
- Volume 1, Appendix B, page B-596: Mark the "no" box to answer question 3.3.4. concerning PCBs based on information available as of December 31, 2000. This data will be evaluated for subsequent LDR reports. (Enclosure 4 to the October 29, 2001, DOE comment response package [02-RCA-022]). [CHG/BNI TGDS concerning Single-Shell Tank (SST) waste]
- Volume 1, Appendix B, page B-600: Mark the yes box to answer question 2.11. Delete explanatory text and replace with the following: "It is unknown if further information will be needed for disposal. Awaiting information such as variances and delisting petitions. Waste is sampled and characterized per RPP-8093, Fiscal Year 2002 Tank Characterization Technical Sampling Basis and Waste Information Requirements Document, 8/2001 (WIRD document) and the Regulatory Data Quality Objectives, PNNL-12040 Rev 0, 12/1998. Waste from SST retrievals must meet DST waste acceptance criteria. [CHG/BNI LSDS concerning SST-A waste]
- Volume 1, Appendix B, page B-604: Mark the yes box to answer question 2.11. Delete explanatory text and replace with the text contained in errata bullet for Volume 1, Appendix B, page B-600. [CHG/BNI LSDS concerning SST-AR waste]
- Volume 1, Appendix B, page B-608: Mark the yes box to answer question 2.11. Delete explanatory text and replace with the text contained in errata bullet for Volume 1, Appendix B, page B-600. [CHG/BNI LSDS concerning SST-AX waste]
- Volume 1, Appendix B, page B-612: Mark the yes box to answer question 2.11. Delete explanatory text and replace with the text contained in errata bullet for Volume 1, Appendix B, page B-600. [CHG/BNI LSDS concerning SST-B waste]
- Volume 1, Appendix B, page B-616: Mark the yes box to answer question 2.11. Delete explanatory text and replace with the text contained in errata bullet for Volume 1, Appendix B, page B-600. [CHG/BNI LSDS concerning SST-BX waste]
- Volume 1, Appendix B, page B-620: Mark the yes box to answer question 2.11. Delete explanatory text and replace with the text contained in errata bullet for Volume 1, Appendix B, page B-600. [CHG/BNI LSDS concerning SST-BY waste]
- Volume 1, Appendix B, page B-624: Mark the yes box to answer question 2.11. Delete explanatory text and replace with the text contained in errata bullet for

- Volume 1, Appendix B, page B-600. [CHG/BNI LSDS concerning SST-C waste]
- Volume 1, Appendix B, page B-628: Mark the yes box to answer question 2.11. Delete explanatory text and replace with the text contained in errata bullet for Volume 1, Appendix B, page B-600. [CHG/BNI LSDS concerning SST-CR waste]
  - Volume 1, Appendix B, page B-636: Mark the yes box to answer question 2.11. Delete explanatory text and replace with the text contained in errata bullet for Volume 1, Appendix B, page B-600. [CHG/BNI LSDS concerning SST-S waste]
  - Volume 1, Appendix B, page B-640: Mark the yes box to answer question 2.11. Delete explanatory text and replace with the text contained in errata bullet for Volume 1, Appendix B, page B-600. [CHG/BNI LSDS concerning SST-SX waste]
  - Volume 1, Appendix B, page B-644: Mark the yes box to answer question 2.11. Delete explanatory text and replace with the text contained in errata bullet for Volume 1, Appendix B, page B-600. [CHG/BNI LSDS concerning SST-T waste]
  - Volume 1, Appendix B, page B-648: Mark the yes box to answer question 2.11. Delete explanatory text and replace with the text contained in errata bullet for Volume 1, Appendix B, page B-600. [CHG/BNI LSDS concerning SST-TX waste]
  - Volume 1, Appendix B, page B-652: Mark the yes box to answer question 2.11. Delete explanatory text and replace with the text contained in errata bullet for Volume 1, Appendix B, page B-600. [CHG/BNI LSDS concerning SST-TY waste]
  - Volume 1, Appendix B, page B-656: Mark the yes box to answer question 2.11. Delete explanatory text and replace with the text contained in errata bullet for Volume 1, Appendix B, page B-600. [CHG/BNI LSDS concerning SST-U waste]
  - Volume 1, Appendix B, page B-733: Delete explanatory text from answer to question 2.11 and replace with: "The waste at WRAP is processed through WRAP and transferred on to another TSD unit or Atomic Energy Act disposal location. A commitment is not necessary to complete this characterization because it is part of WRAP's ongoing activities." [FH LSDS concerning Waste Receiving and Process Facility (WRAP) TRUM-CH waste]
  - Volume 1, Appendix C, page C-1: Delete text in Table C-2, Column D Content Description and replace with: "Stuff" (e.g., equipment, materials) that is not currently in use and for which no future use is currently known, but for which the final disposition has not yet been determined. The "stuff" is not currently considered mixed-waste and may or may not currently be contaminated, but includes items with the potential for becoming mixed waste, depending on future decisions regarding their ultimate use and disposition. "Stuff" integral to the building is not to be included. "None" in this column indicates the project/facility contains no "stuff" known to be in this category. (Enclosure 5 to the October 29, 2001, DOE comment response package [02-RCA-022]) [Potential Mixed Waste Table instructions]
  - Volume 1, Appendix C, page C-1: Delete text in Table C-2, Column E Content Description and replace with: "Stuff" (e.g., equipment, materials) that is currently in "standby" and may at some point, if it becomes waste, designate as mixed waste. Provide details for standby equipment/material that has a clear use of path for reuse/recycling, but may at some point, if/when it becomes waste, designate as mixed waste. **Columns D and E encompass contents of buildings and structures only. Floor sweepings, dust, etc., are not included. The structures themselves, including contaminated walls, floors, etc., are not included. Equipment and**

**chemicals that are in use are not included.** (Enclosure 5 to the October 29, 2001, DOE comment response package [02-RCA-022]) [Potential Mixed Waste Table instructions]

- Volume 1, Appendix C, page C-17: Add the following text to Table C-2, Column F, "DOE Assessment: Not Applicable." [FH 300-RRLWS entry]
- Volume 1, Appendix C, page C-21: Delete text in Table C-2, Column G regarding plan to fill data gap and replace with "FY 2003." [PNNL 325 entry Potential Mixed Waste Table]
- Volume 2, Section 3.3.1, Page 3-22: Add column to right end of table titled "Remaining Balance\*" Add footnote to table stating: "\* = Remaining volume will be characterized based upon yet to be developed treatment and disposal schedules for MLLW." Under the MLLW-02 entry for FY04, add "26" for the volume to be characterized. In the new remaining balance column, add "0" for MLLW-01, "0" for MLLW-02, "0" for MLLW-03, "0" for MLLW-04, "1" for MLLW-05, "0" for MLLW-06, and "39" for MLLW-07. [CWC Pre-1995 inventory characterization]
- Volume 2, Section 3.3.1, Page 3-22: Add the following text to the end of the section: "Treat and/or dispose 7,795 m3 of (i.e., pre-treatment volume) mixed, low-level waste (MLLW) by June 30, 2006. Propose successor milestones for MLLW treatment and/or disposal for the July 1, 2006 through June 30, 2011, timeframe by June 30, 2005. Prepare a draft, detailed strategy for processing legacy and newly generated MLLW stored in the Central Waste Complex (CWC) update annually beginning October 31, 2002. Characterize, treat and dispose of the majority of the contact-handled MLLW-01 through MLLW-10 inventory in the CWC by September 30, 2012. It should be noted that some small volume of MLLW-01 through MLLW-10 will be in storage at any given time to allow accumulation of sufficient volumes to support treatment campaigns. Additional treatment and/or disposal will be addressed as part of the active M-91 negotiations." (Enclosure 8 to the October 29, 2001, DOE comment response package [02-RCA-022]) [Change request statements regarding CWC waste M-xx-01, M-xx-02, M-xx-03, M-xx-09]

## **Documentation of Other Agreements**

1. DOE and Ecology need to hold workshops during the summer of 2002 to make changes to the Treatability Group Data Sheets and Location Specific Data Sheet questions. In addition, the workshops will address:
  - Consolidation of requirements documents for the LDR report
  - Tracking commitments contained in the LDR Report
  - How to accomplish within-year changes in the annual LDR report; and
  - How to accomplish year-to-year changes in the LDR report
  - Revisit assessment schedule (e.g., 231-Z and IMUSTS)
  - Mechanism to transmit documents (e.g., data gap plan)
2. Need to update Potential Mixed Waste Table instructions for CY2001 LDR report preparation to include Expectation #3 (Attachment 1 page 1 of 2) regarding future use.
3. The DOE LDR storage assessment report shall:
  - Identify the assessment scope and standards used to conduct the assessment
  - Provide an overall summary of compliance status based on scope of assessment results. Also, include a summary comparing Potential Mixed Waste Storage conditions to mixed waste storage criteria
  - Document the facts regarding what you know and what you don't know
  - Attach the completed checklist used during the assessment.
4. The data gap plan will contain four elements – 1) What you know, 2) what you don't know, 3) what you need to know, and 4) why the level of unknowns is acceptable or not acceptable from a safety basis for the interim until action is planned or that more information is needed to make this determination.
  - Items 1 and 2 from above are provided by the DOE LDR storage assessment and any additional project evaluation information
  - Items 3 and 4 from above are the added content of the data gap plan
  - Item 4: It is acceptable to answer this question by indicating more information is needed to make the determination. If available, the data gap plan may include a plan to obtain the information believed to be needed to make a determination. The TPA lead regulatory agency project manager should be contacted to begin discussions and development of a path forward.

The goal after discussions is to have an agreement with the TPA lead regulatory agency project manager on the path forward for PMW/MW in the unit. When the DOE LDR storage assessment schedule date is not available: Assessment = Not scheduled, Plan to fill data gaps = TBD, Start negotiations = TBD. For major negotiations such as the start of facility transition or deactivation, provide a negotiations start date. For little stuff, negotiations may not be necessary: Start negotiations = Not appropriate.

Since detailed plans to address all data gaps are not required in order to complete the

data gap plan, the expectation is that it should typically be possible to complete the data gap plan relatively quickly, such as within a year, after the DOE LDR storage assessment is complete. Typically, it is anticipated that this data gap plan could consist of a several page letter report addressing the items identified above. Alternatively, other more detailed documents such as CERCLA work plans can be used to meet the data gap plan need. Use "Complete" in the Potential Mixed Waste Table in future LDR reports if the data gap plan is done. Indicate project manager discussions ongoing or complete, as appropriate.

5. During Ecology's review of the LDR report as a primary document, Ecology's intends to request additional information informally during the comment review period so to avoid requests as a formal comment on the LDR report.
6. Location-Specific Data Sheet question 2-11 regarding characterization: Interpret question 2.11 to read: Is further information needed about the waste prior to acceptance for Treatment, Storage, or Disposal? Answer TSD question separately so that there could be three different answers: one for storage, one for treatment, and one for disposal.

The three possible answers will remain the same as the existing question: Yes, No, and Unknown at this time. Since the database only allows one answer, mark one answer only if there is one answer to all three aspects of the question (TSD). If there is more than one answer, leave all three boxes blank and rely on the explanation area of 2.11. Use the explanation area of question 2.12 if additional space is necessary.

If the answer is Yes, an explanation of the answer is required. The explanation will either reference an existing milestone or agreement to obtain the information, reference active negotiations addressing the commitment, include a commitment to obtain the information, or the text will describe why a commitment is not necessary. The following are examples of information needs that do not require a commitment:

- Radioactive characterization issues
- Characterization required as a normal process when a cradle to grave process is being implemented (e.g., waste being sent to 200 Area Liquids)
- Unit-specific waste acceptance data not required for LDR waste characterization (e.g., total suspended solids for sending waste to the 200 Area Liquids, or Real-Time radiography)

If the answer is No, it means the waste is ready to be managed through the disposal phase.

If the answer is unknown at this time, an explanation is necessary. The explanation needs to identify what step(s) needs to be completed before the question can be answered.

Question 2-11 will be answered differently in the current report being prepared and the data sheets will be revised in the CY2002 LDR report submitted in April 2003.



7. The data sheets under relevant treatability groups in the CY2001 LDR report being prepared will reference the ongoing M-91 TPA negotiations for characterization, treatment, and disposal needs.
8. The following locations on the Hanford Site are excluded from DOE LDR storage assessments:
  - Key facilities in the surveillance and maintenance phase
  - Locations only with satellite accumulation areas or 90-day accumulation areas.

## **Disposition of Dispute Deficiencies in the CY2000 LDR Report**

### **POTENTIAL MIXED WASTE TABLE**

#### **224-T TRUSAF:**

- **ACCEPTED:** DOE did propose a milestone to initiate TRUSAF deactivation negotiations by 2012. This milestone is acceptable; however, may need to be renegotiated based on the results from the evaluation of the storage conditions and the results from filling the data gaps.
- A second TPA milestone is needed to submit a plan to fill data gaps to support the path forward negotiations, including an evaluation of the storage conditions (per the agreed upon procedure).

#### **Dispute Disposition:**

No change to the Potential Mixed Waste Table entry is necessary in the CY2000 LDR report. The CY2001 LDR report will contain the following entries in the Potential Mixed Waste Table:

DOE Assessment: 1<sup>st</sup> quarter CY2002

Data gap plan: 4<sup>th</sup> quarter CY2002

Starting negotiations: 2012

#### **231-Z:**

- DOE did propose a date of 2014 to complete 231-Z deactivation; however, it needs to be presented in the form of a milestone for start of negotiations or reference an existing milestone. The negotiation start date may need to be renegotiated based on the results from the evaluation of the storage conditions and the results from filling the data gaps.
- A second TPA milestone is needed to submit a plan to fill data gaps to support the path forward negotiations, including an evaluation of the storage conditions (per the agreed upon procedure).

#### **Dispute Disposition:**

No change to the Potential Mixed Waste Table entry is necessary in the CY2000 LDR report. The CY2001 LDR report will contain the following entries in the Potential Mixed Waste Table:

DOE Assessment: 1<sup>st</sup> quarter CY2006

Data gap plan: 1<sup>st</sup> quarter CY2007

Starting negotiations: TBD

#### **324 Building:**

- DOE did propose a date of FY2002 through FY2003 to perform deactivation activities; however, there is no reference to existing milestones for the deactivation commitments. These activities may need to be presented in the form of a milestone commitment.
- A second TPA milestone may be needed to submit a plan to fill data gaps to

support the path forward negotiations, including an evaluation of the storage conditions (per the agreed upon procedure).

**Dispute Disposition:**

No change to the Potential Mixed Waste Table entry is necessary in the CY2000 LDR report. The CY2001 LDR report will contain the following entries in the Potential Mixed Waste Table:

DOE Assessment: 4<sup>th</sup> quarter CY2002

Data gap plan: 4<sup>th</sup> quarter CY2003

Starting negotiations: Completed (See 100 Area and 300 Area Waste Sites and Facilities Cleanup Milestones)

**333 Building:**

- DOE did propose a date of 2008 to complete 333 Building deactivation; however, it needs to be presented in the form of a milestone for start of negotiations or reference an existing milestone. The negotiation start date may need to be renegotiated based on the results from the evaluation of the storage conditions and the results from filling the data gaps.
- A second TPA milestone is needed to submit a plan to fill data gaps to support the path forward negotiations.
- DOE did make the commitment to do a storage assessment in November 2002.

**Dispute Disposition:**

No change to the Potential Mixed Waste Table entry is necessary in the CY2000 LDR report. The CY2001 LDR report will contain the following entries in the Potential Mixed Waste Table:

DOE Assessment: 1<sup>st</sup> quarter CY2003

Data gap plan: 1<sup>st</sup> quarter CY2004

Starting negotiations: Completed (See 100 Area and 300 Area Waste Sites and Facilities Cleanup Milestones)

**340 Building:**

- DOE did propose a date of September 30, 2006 for tank heel removal and any residues resulting from the cleanout of ancillary equipment, and referenced TPA Milestones M-92-12 and -14.
- DOE did propose a date of FY2009 to begin 340 Vault Tank removal and characterization; however, it needs to be presented in the form of a milestone for start of negotiations or reference an existing milestone.
- A second TPA milestone is needed to submit a plan to fill data gaps to support the path forward negotiations.
- DOE did make the commitment to do a storage assessment in July 2002.

Dispute Disposition:

No change to the Potential Mixed Waste Table entry is necessary in the CY2000 LDR report. The CY2001 LDR report will contain the following entries in the Potential Mixed Waste Table:

DOE Assessment: 4<sup>th</sup> quarter CY2003

Data gap plan: 4<sup>th</sup> quarter CY2004

Starting negotiations: Completed (See 100 Area and 300 Area Waste Sites and Facilities Cleanup Milestones)

**340-A Tanks:**

- DOE did propose a date of September 30, 3006 for 340-A tank cleanout and any residues resulting from the cleanout of ancillary equipment, and referenced TPA Milestones M-92-12 and -14.
- DOE did propose a date of FY2009 to begin 340-A tanks and ancillary equipment removal and characterization; however, it needs to be presented in the form of a milestone for start of negotiations or reference an existing milestone.
- A second TPA milestone is needed to submit a plan to fill data gaps to support the path forward negotiations.
- DOE did make the commitment to do a storage assessment in July 2002.

Dispute Disposition:

No change to the Potential Mixed Waste Table entry is necessary in the CY2000 LDR report. The CY2001 LDR report will contain the following entries in the Potential Mixed Waste Table:

DOE Assessment: 4<sup>th</sup> quarter CY2003

Data gap plan: 4<sup>th</sup> quarter CY2004

Starting negotiations: Completed (See 100 Area and 300 Area Waste Sites and Facilities Cleanup Milestones)

**340-B Tanks:**

- DOE did propose a date of September 30, 3006 for 340-B cleanout of process piping and ancillary equipment and referenced TPA Milestones M-92-12 and -14.
- DOE did propose a date of FY2009 to begin 340-A tanks and ancillary equipment removal and characterization; however, it needs to be presented in the form of a milestone for start of negotiations or reference an existing milestone.
- A second TPA milestone is needed to submit a plan to fill data gaps to support the path forward negotiations.
- DOE did make the commitment to do a storage assessment in July 2002.

Dispute Disposition:

No change to the Potential Mixed Waste Table entry is necessary in the CY2000 LDR report. The CY2001 LDR report will contain the following entries in the Potential Mixed Waste Table:

DOE Assessment: 4<sup>th</sup> quarter CY2003

Data gap plan: 4<sup>th</sup> quarter CY2004

Starting negotiations: Completed (See 100 Area and 300 Area Waste Sites and Facilities

**Cleanup Milestones)****300-RRLWS:**

- DOE did propose a date of 2009 to commence remediation of the RRLWS; however, it needs to be presented in the form of a milestone for start of negotiations or reference an existing milestone. The negotiation start date may need to be renegotiated based on the results from the evaluation of the storage conditions and the results from filling the data gaps.
- A second TPA milestone is needed to submit a plan to fill data gaps to support the path forward negotiations, including an evaluation of the storage conditions (per the agreed upon procedure).

**Dispute Disposition:**

The entry in the CY2000 Potential Mixed Waste Table has been amended. See errata sheet bullet in Attachment 2. Note that this entry will be deleted from the PMWT in the CY 2001 LDR report because this is a retired below ground piping system.

**300-RLWS:**

- DOE did propose a date of September 30, 3006 for cleanout of the radioactive liquid waste sewer piping and ancillary equipment and referenced TPA Milestones M-92-12 and -14.
- DOE did propose a date of FY2009 to begin 330-RLWS piping and ancillary removal and characterization; however, it needs to be presented in the form of a milestone for start of negotiations or reference an existing milestone.
- A second TPA milestone is needed to submit a plan to fill data gaps to support the path forward negotiations.
- DOE did make the commitment to do a storage assessment in July 2002.

**Dispute Disposition:**

No change to the Potential Mixed Waste Table entry is necessary in the CY2000 LDR report. The CY2001 LDR report will contain the following entries in the Potential Mixed Waste Table:

DOE Assessment: 4<sup>th</sup> quarter CY2003

Data gap plan: 4<sup>th</sup> quarter CY2004

Starting negotiations: Completed (See 100 Area and 300 Area Waste Sites and Facilities Cleanup Milestones)

**T Plant Canyon:**

- DOE did propose a date of October 2002 for clearing off 10 sections of canyon deck, 8 canyon cells, and removing 4 pieces of equipment.
- DOE did propose a date of 2028 to fill data gaps; however, this date is too far in the future. The date to fill data gaps will need to be based on the results from the evaluation of the storage conditions and presented in the form of a milestone or reference an existing milestone.
- DOE did make the commitment to do a storage assessment in July 2003.

Dispute Disposition:

No change to the Potential Mixed Waste Table entry is necessary in the CY2000 LDR report. The CY2001 LDR report will contain the following entries in the Potential Mixed Waste Table:

DOE Assessment: 3<sup>rd</sup> quarter CY2005

Data gap plan: 3<sup>rd</sup> quarter CY2006

Starting negotiations: TBD

**325 Radiochemical Processing Laboratory:**

- DOE did propose a date of 2025 to begin deactivation negotiations; however, it needs to be presented in the form of a milestone for start of negotiations or reference an existing milestone. The negotiation start date may need to be renegotiated based on the results from the evaluation of the storage conditions and the results from filling the data gaps.
- A second TPA milestone is needed to submit a plan to fill data gaps to support the path forward negotiations, including an evaluation of the storage conditions (per the agreed upon procedure).
- DOE did make the commitment to do a storage assessment in October 2001.

Dispute Disposition:

The entry in the CY2000 Potential Mixed Waste Table has been amended. See errata sheet bullet in Attachment 2.

**701-A Ventilation Building:**

- DOE did propose a date of FY2005 to begin negotiations; however, it needs to be presented in the form of a milestone for start of negotiations or reference an existing milestone. The negotiation start date may need to be renegotiated based on the results from the evaluation of the storage conditions and the results from filling the data gaps.
- A second TPA milestone is needed to submit a plan to fill data gaps to support the path forward negotiations, including an evaluation of the storage conditions (per the agreed upon procedure).

Dispute Disposition:

No change to the Potential Mixed Waste Table entry is necessary in the CY2000 LDR report. The CY2001 LDR report will contain the following entries in the Potential Mixed Waste Table:

DOE Assessment: 4<sup>th</sup> quarter CY2003.

Data gap plan: 4<sup>th</sup> quarter CY2004.

Starting negotiations: FY 2005

**IMUSTS not associated with a building:**

- DOE did suggest an anticipated date of FY2004 have specific M-13 milestones set. DOE also proposed a date of FY2008 for completing the RI/FS process; however, it needs to be presented in the form of a milestone or reference an existing milestone. These dates may need to be renegotiated based on the results

from the evaluation of the storage conditions and the results from filling the data gaps.

- A second TPA milestone is needed to submit a plan to fill data gaps to support the path forward negotiations, including an evaluation of the storage conditions (per the agreed upon procedure).

**Dispute Disposition:**

No change to the Potential Mixed Waste Table entry is necessary in the CY2000 LDR report. The CY2001 LDR report will contain the following entries in the Potential Mixed Waste Table:

DOE Assessment: 2<sup>nd</sup> quarter CY2006

Data gap plan: 2<sup>nd</sup> quarter CY2007

Starting negotiations: Ongoing as part of Central Plateau negotiations.

**REDOX:**

- DOE did propose a date of 2032 to begin negotiations; however, it needs to be presented in the form of a milestone for start of negotiations or reference an existing milestone.
- A second TPA milestone is needed to submit a plan to fill data gaps to support the path forward negotiations, including an evaluation of the storage conditions (per the agreed upon procedure). The negotiation start date may need to be renegotiated based on the results from the evaluation of the storage conditions and the results from filling the data gaps.
- DOE did make the commitment to do a storage assessment in May 2003.

**Dispute Disposition:**

No change to the Potential Mixed Waste Table entry is necessary in the CY2000 LDR report. The CY2001 LDR report will contain the following entries in the Potential Mixed Waste Table:

DOE Assessment: Not applicable (see Attachment 3 agreement)

Data gap plan: Not applicable

Starting negotiations: Complete. Any additional negotiations will be held in accordance with Section 8.6.2 of the Tri-Party Agreement Action Plan

**U Plant:**

- DOE did propose a date of 2011 (or later) to decommission U Plant, however, it needs to be presented in the form of a milestone for start of negotiations or reference an existing milestone.
- DOE did make the commitment to submit a proposed plan in FY 2002. It is unclear as to whether or not this proposed plan will include an evaluation of the storage conditions (per the agreed upon procedure). The negotiation start date may need to be renegotiated based on the results from the evaluation of the storage conditions and the results from filling the data gaps.

**Dispute Disposition:**

No change to the Potential Mixed Waste Table entry is necessary in the CY2000 LDR

report. The CY2001 LDR report will contain the following entries in the Potential Mixed Waste Table:

DOE Assessment: Not applicable (see Attachment 3 agreement)

Data gap plan: Not applicable

Starting negotiations: Complete. Any additional negotiations will be held in accordance with Section 8.6.2 of the Tri-Party Agreement Action Plan

**UO3 Facility:**

- DOE did propose a date of 2023 to begin decommission of UO3 Facility; however, it needs to be presented in the form of a milestone for start of negotiations or reference an existing milestone.
- DOE did reference the UO3 S&M plan; however, it is unclear as to whether or not this S&M plan includes an evaluation of the storage conditions (per the agreed upon procedure). A second TPA milestone may be needed to submit a plan to fill data gaps to support the path forward negotiations, including an evaluation of the storage conditions. The negotiation start date may need to be renegotiated based on the results from the evaluation of the storage conditions and the results from filling the data gaps.

**Dispute Disposition:**

No change to the Potential Mixed Waste Table entry is necessary in the CY2000 LDR report. The CY2001 LDR report will contain the following entries in the Potential Mixed Waste Table:

DOE Assessment: Not applicable (see Attachment 3 agreement)

Data gap plan: Not applicable

Starting negotiations: Complete. Any additional negotiations will be held in accordance with Section 8.6.2 of the Tri-Party Agreement Action Plan

**200 North Area:**

- DOE did reference the 100 Area Remaining Sites ROD; however, commitment dates needs to be presented in the form of a milestone or reference an existing milestone.
- A second TPA milestone may be needed to submit a plan to fill data gaps to support the path forward negotiations, including an evaluation of the storage conditions (per the agreed procedure).

**Dispute Disposition:**

No change to the Potential Mixed Waste Table entry is necessary in the CY2000 LDR report. The CY2001 LDR report will contain the following entries in the Potential Mixed Waste Table:

DOE Assessment: 4<sup>th</sup> quarter CY2005

Data gap plan: 4<sup>th</sup> quarter CY2006

Starting negotiations: TBD



## **DOE'S RESPONSE TO ECOLOGY'S COMMENTS**

*Note: Comment numbers refer to Ecology's original primary document comments contained in the September 27, 2001, letter from Laura Ruud, Ecology, to Keith A. Klein, RL, and Harry Boston, ORP.*

**#1-7:** Ecology asked for, among other things, the criteria DOE uses to determine when the "material" or "solid waste" undergoes a dangerous waste designation in accordance with WAC 173-303, and the "clear use or path for reuse/recycling" that has been established for potential mixed wastes. DOE responded by saying that "The Potential Mixed Waste Table is not subject to the requirements cited in the Director's Determination." In response to Comment #1-5, DOE acknowledged that the Potential Mixed Waste Table was developed as a compromise to avoid litigation with respect to the violation cited in the Director's Determination of failing to identify all mixed waste at Hanford. Ecology believes that it is reasonable to ask DOE the criteria used at Hanford to make future-use determinations.

### Dispute Disposition:

The portion of this comment addressing a "material" is resolved with expectation #3 in Attachment 1 regarding future use. The portion of this comment addressing "solid waste" is resolved by the storage assessment and the data gap plan concepts.

**#1-8:** The Hexone tanks are a TSD unit and the contents have designated as mixed waste. These tanks should not be represented on the PMWT.

### Dispute Disposition:

No change to CY2000 LDR report is necessary. A new treatability group and a new location specific data sheet will be prepared and submitted in the CY2001 LDR report.

**#2-1 through #2-17:** Responses are unacceptable. Tank farm assessments were not conducted in accordance with the agreed upon procedures. Ecology has met with DOE-ORP representatives regarding the deficiencies. Ecology will communicate these deficiencies as well in a face-to-face meeting with DOE-RL.

### Dispute Disposition:

No changes to the CY2000 LDR report are necessary. The following discussion provides for resolution of these comments.

ORP conducted the LDR assessments in 2000 and 2001 on the belief that ORPID 435.1 provided the flexibility in scope and methodology for conducting LDR assessments for those sources/facilities scheduled in the LDR Plan. However, after review of Ecology comments regarding ORP assessments and subsequent discussions, it is apparent the ORP and Ecology interpretations of ORPID 435.1 differed dramatically.

ORP recognizes the importance of assessing sources/facilities against all the LDR requirements and had begun developing Lines of Inquiry that will identify the applicable

LDR requirements for sources/facilities for which ORP has responsibility. To ensure consistent interpretation between ORP and Ecology, ORP will amend ORPID 435.1 to (1) reflect the current organizational structure and (2) clarify the intent to use any or all methods described in Section 5.2.4 to assess a source against all applicable LDR requirements.

Commencing with CY2002, ORP will assess a limited number of sources/facilities, as described in Table 3-4 of the CY2000 Report, against all applicable LDR requirements. Should existing resources be insufficient to assess all scheduled facilities to the agreed upon criteria, ORP and Ecology will then prioritize and reschedule assessments based on available resources.

**#2-19:** Ecology asked for specific information as to what was included in the assessment of the 241-Z tanks and if the findings were transmitted to the contractor for corrective action. DOE responded by saying that "Specific comments are beyond the scope of the LDR Report." Ecology believes that it is reasonable to ask DOE for specific information as to the quality of the assessment and if corrective actions were scheduled.

**Dispute Disposition:**

No changes to the CY2000 LDR report are necessary. DOE-RL transmitted the Plutonium Finishing Plant LDR storage assessment report to the contractor on September 13, 2001. The following describes how DOE tracks corrective actions from the time they are found until they are closed. FH and DOE share a common tracking system called the deficiency tracking system (DTS). Using the DOE LDR storage assessment report, RL enters RL's "corrective action assignment," with such an entry as "RL verify corrective actions and close findings," and other descriptive information into the DTS database. Subsequently, the contractor (FH) scores the data and enters other information into the DTS database system, such as additional corrective action assignments. The contractor assigns priorities via the risk ranking value (RRV). When the work is completed, FH provides closure packages to document that a given finding, etc. is ready to be closed, and RL personnel assess the worthiness of the package. The RL assessor notifies the database custodian when an action is appropriate to close, and the custodian closes it in the database. In this fashion, all corrective actions are accounted for through completion.

**#3-1:** DOE did not propose TPA milestones for the characterization of all mixed waste where treatment and disposal cannot be accomplished within one year of generation. DOE did propose a TPA milestone for treatment and disposal of most of the MLLW-01 through MLLW-10 waste; however, characterization milestones are also required. However, several streams, including some under MLLW-01 through 10, do not have adequate characterization schedules. Also, it is difficult to establish accountability when characterization and treatment is not tied to specific waste streams or treatability groups.

**Dispute Disposition:**

- CWC waste: Characterization of waste stored in CWC will be performed to support the results of the active M-91 TPA dispute negotiations. No changes to the CY2000

LDR report are necessary. Refer to agreement 7 in Attachment 3 for the approach to characterization in the CY2001 LDR report.

- Tank Waste: An errata sheet has been prepared changing the explanatory text to question 2.11 regarding characterization for each location specific data sheet concerning DST and SST tank waste. Refer to Attachment 2.
- 222-S; MLLW-03 treatability group: An errata sheet has been prepared changing the explanatory text to question 2.11 regarding characterization for the location specific data sheet concerning this waste. Refer to Attachment 2.
- 221-T; MLLW-04B treatability group: An errata sheet has been prepared changing the explanatory text to question 2.11 regarding characterization for the location specific data sheet concerning this waste. Refer to Attachment 2.
- 2706-T RCRA Tank System; LERF/ETF liquid waste treatability group: An errata sheet has been prepared changing the explanatory text to question 2.11 regarding characterization for the location specific data sheet concerning this waste. Refer to Attachment 2.
- T Plant M-91; MLLW-07 treatability group: An errata sheet has been prepared changing the answer from “yes” to “no” to question 2.11 regarding characterization for the location specific data sheet concerning this waste. Characterization is not required for the 6 containers reported on this location specific data sheet. The 6 waste containers require processing at T Plant. The 6 waste containers reported under this location specific data sheet will either be relocated to another location specific data sheet or will be deleted in the CY2001 LDR report. Refer to Attachment 2.
- WRAP; TRUM-CH treatability group: An errata sheet has been prepared changing the answer to question 2.11 regarding characterization for the location specific data sheet concerning this waste. Refer to Attachment 2.

**#3-4:** Ecology asked for specific schedules and milestones for characterization and treatment of TRUM waste. It is acceptable for DOE to negotiate these commitments as part of M-91 negotiations. However, there needs to be some assurance that the milestones for characterization and treatment of TRUM will be specifically required under M-91 negotiations. It appears from the text of M-91 that the main focus of this milestone is to complete the acquisition of new facilities and/or modify existing facilities; however, specific milestones for characterization and treatment of TRUM waste would be welcomed.

**Dispute Disposition:**

Schedules and milestones will be addressed as part of the M-91 TPA dispute discussions. No change to the CY2000 LDR report is necessary. Where appropriate, the CY2001 LDR report will make reference to the active M-91 TPA negotiations. Refer to agreement 7 in Attachment 3 for the approach to characterization in the CY2001 LDR report.

**#3-5:** Ecology commented that the milestones that DOE referenced for treatment do not necessarily provide the specific data for scheduling waste treatment and do not explain coordination with commitments made in the LDR report. DOE’s response did not address the comment.

Dispute Disposition:

DOE will ensure that TPA negotiations factor in the information contained within the LDR report. No change to the CY2000 LDR report is necessary. The CY2001 LDR report will make the appropriate references to TPA milestones.

**#3-6:** Ecology and DOE need to again have a conversation about the requirements for generators to characterize their waste. Reference to the Regulatory DQO is acceptable as a compliance schedule that meets those characterization requirements; however, is it not acceptable to state that the no further characterization is needed for waste designation and/or LDR for storage.

Dispute Disposition:

An errata sheet has been prepared changing the answer to question 2.11 regarding characterization for each location specific data sheet concerning DST and SST tank waste. Refer to Attachment 2.

**TPA CHANGE CONTROL FORM**

Ecology would like to engage in detailed conversation with DOE regarding development of clear, accountable language for characterization and treatment of mixed waste. The milestones presented are, in general, acceptable, although will need to have additional language to clarify the commitments. Additional milestones will be needed, as noted above, to complete the requirements of the Hanford LDR plan and M-26-01K.

Dispute Disposition:

The TPA change request was proposed as Enclosure 8 to the October 29, 2001, DOE comment response package (02-RCA-022). The TPA change request proposed 10 interim milestones. In lieu of finalizing the change request, the proposed interim milestones will be either incorporated into the CY2000 LDR report or deleted. See below for disposition of each proposed interim milestone.

**M-xx-01**

Treat and/or dispose 7,795 m3 of (i.e., pre-treatment volume) mixed, low-level waste (MLLW).

Proposed date: June 30, 2006.

Dispute Disposition:

To be incorporated into Volume 2 of the CY2000 LDR report. Refer to errata sheet in Attachment 2.

**M-xx-02**

Propose successor milestones for MLLW treatment and/or disposal for the July 1, 2006 through June 30, 2011, timeframe.

Proposed date: June 30, 2005.

Dispute Disposition:

To be incorporated into Volume 2 of the CY2000 LDR report. Refer to errata sheet in Attachment 2.

**M-xx-03**

Prepare a draft, detailed strategy for processing legacy and newly generated MLLW stored in the Central Waste Complex (CWC) update annually

Proposed date: October 31 of each year. First submittal will be in 2002.

Dispute Disposition:

To be incorporated into Volume 2 of the CY2000 LDR report. Refer to errata sheet in Attachment 2.

**M-xx-04**

Provide the updated Waste Management Strategic Plan to Ecology and EPA

Proposed date: December 31 of each year. First submittal will be in 2002.

Dispute Disposition:

Proposed text deleted because the Waste Management Strategic Plan is not referenced in the LDR report and does not relate to commitments contained in the report.

**M-xx-05**

Evaluate CWC storage capacity annually and provide a summary report to Ecology and EPA.

Proposed date: February 28 of each year. First submittal will be in 2002.

Dispute Disposition:

Proposed text deleted because this information duplicates information contained in Volume 1, Section 4.1.3.

**M-xx-06**

Begin negotiations of the path forward for the 701-A Ventilation Building and the 242-S and 242-T Evaporators.

Proposed date: January 31, 2005

Dispute Disposition:

Proposed text deleted because it duplicates text already contained in the Potential Mixed Waste Table, Volume 1, Appendix C.

**M-xx-07**

Develop plan on how to fill data gaps and/or acquire the necessary data to make waste determination for the C855 (CAT) Substation/252 U Transformers, SNF Lead Bricks, Rad Storage Building/3711 Lead Bricks, and Waste Storage Building/2724 WB Radiators.

Proposed date: September 30, 2002

Dispute Disposition:

Proposed text deleted because it duplicates text already contained in the Potential Mixed Waste Table, Volume 1, Appendix C.

**M-xx-08**

Initiate TRUSAF deactivation negotiations by 2012 to support the 2014 schedule.

Proposed date: June 30, 2012.

Dispute Disposition:

Proposed text deleted because this commitment will be incorporated into the Potential Mixed Waste Table in Volume 1, Appendix C of the CY2001 LDR report. Since deactivation discussions will address the entire building, reference to TRUSAF will be changed to the 224-T building. Refer to the beginning of this attachment for the Potential Mixed Waste Table entry for 224-T.

**M-xx-09**

Characterize, treat and dispose of the majority of the contact-handled MLLW-01 through MLLW-10 inventory in the CWC. It should be noted that some small volume of MLLW-01 through MLLW-10 will be in storage at any given time to allow accumulation of sufficient volumes to support treatment campaigns.

Proposed date: September 30, 2012.

Dispute Disposition:

To be incorporated into Volume 2 of the CY2000 LDR report. See errata sheet in Attachment 2.

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**ADMINISTRATIVE RECORD: M-026 LDR Report [Care of EDMC, LMSI (H6-08)]**

Please send comments on distribution list to Anthony G. Miskho (376-7313).